

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENWOOD DIVISION

United States of America,)
)
)
v.)
)
Jamal Demarcus Latimer,)
Defendant.)

Cr. No.: 8:19-cr-00181

**MOTION FOR LEAVE TO FILE TO SEAL THE SENTENCING
MEMORANDUM AND MOTION**

COMES NOW Jamal Demarcus Latimer, by and through the undersigned Counsel, who hereby moves this Court to allow Mr. Latimer to file with the Clerk of Court under seal the Sentencing Memorandum and Motion for Variance and related exhibits in this matter to be considered at the Sentencing Hearing.

This motion is made pursuant to the Standing Order Regarding Sealing Documents Filed in Criminal Matters, filed October 28, 2014, in 3:14-mc-00333-TLW. Counsel makes this request to protect both the privacy interests and personal safety of the individuals involved in this case. The privacy interest and safety of the individuals involved outweigh the public's interest in access to this material. This Court has inherent authority to seal these documents. Baltimore Sun v. Goetz, 886 F.2d 60 (4th Cir. 1988); In re Application of the United States for an Order Pursuant to 18 U.S.C. Section 2703(D), 707 F.3d 283 (4th Cir. 2013). Based on the important interests at stake and the Court's authority in these matters, counsel for the Mr.

Latimer respectfully requests the Court allow the memorandum, motion, and related exhibits to be filed by the defense in this matter under seal.

Respectfully Submitted,

S/Stephanie A. Rainey

Fed. I. D. No.: 7768

Rainey & Brown, PA

145 N. Church Street, Suite 210

Spartanburg, SC 29306

Phone: (864) 573-7531

Fax: (864) 573-7660

Attorney for Jamal Demarcus Latimer

Date: July 20, 2020